

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
  
Numbering Resource Optimization

CC Docket No. 99-200

**BELLSOUTH OPPOSITION AND COMMENTS**

**BELLSOUTH CORPORATION**

M. Robert Sutherland  
Angela N. Brown

Its Attorneys

Suite 1700  
1155 Peachtree Street, N.E.  
Atlanta, GA 30309-3610  
(404) 249-4839  
(404) 249-3392

Date: August 15, 2000

## TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	
I. THE COMMISSION SHOULD ADOPT USTA'S PROPOSED DEFINITION OF ASSIGNED NUMBERS.....	1
II. THE COMMISSION SHOULD CLARIFY SEVERAL ASPECTS OF ITS NATIONAL POOLING FRAMEWORK.....	3
A. The Commission Should Reject Requests To Impose A Utilization Threshold Requirement On Pooling Carriers .....	3
B. The Commission Should Reject Requests To Require Wireless Carriers To Implement Pooling By January 2001 .....	4
C. The Commission Should Not Establish A More Aggressive Rollout Schedule For Pooling Implementation.....	6
D. The Commission Should Clarify That Pooling Costs Not Recovered Through State Cost Recovery Mechanisms Must Be Eligible For Recovery Under A Federal Mechanism .....	7
E. The Commission Should Not Allow States To Implement 100-Block Number Pooling Or Unassigned Number Porting.....	8
F. The Commission Should Continue To Require All Carriers To Comply With The T1S1.6 Technical Requirements For Pooling .....	9
III. THE COMMISSION SHOULD NOT ALLOW INDIVIDUAL STATES TO IMPOSE ADDITIONAL AND ONEROUS REPORTING REQUIREMENTS ON CARRIERS.....	10
IV. THE COMMISSION SHOULD NOT EXEMPT RESELLERS AND NON-CARRIERS FROM COMPLYING WITH THE NEW REPORTING REQUIREMENTS.....	12
V. THE COMMISSION SHOULD MODIFY ITS SEQUENTIAL NUMBERING RULES TO MAKE THEM MORE PRACTICAL AND TO ENSURE FLEXIBILITY. ....	15
VI. THE COMMISSION SHOULD CLARIFY THE SCOPE OF WITHHOLDING NUMBERS FOR INADEQUATE APPLICATIONS FOR NUMBERING RESOURCES.....	16

VII.	THE COMMISSION SHOULD NOT ESTABLISH A JOINT FEDERAL-STATE COMMITTEE TO APPROVE NUMBERING GUIDELINES .....	16
VIII.	THE COMMISSION SHOULD REQUIRE STATE COMMISSIONS TO ACT ON A CARRIER'S APPEAL OF THE NANPA'S DECISION TO WITHHOLD NUMBERING RESOURCES WITHIN A SPECIFIED TIME PERIOD. ....	18
IX.	CONCLUSION .....	19

## EXECUTIVE SUMMARY

Despite the Commission's best intentions to create a national framework to promote the efficient use of numbering resources, implementation of many of the new rules adopted in the *Numbering Resource Optimization* proceeding has proven to be problematic, as evidenced by the number of petitioners seeking reconsideration and/or clarification of various aspects of the recent decision. In order to implement the new rules in the most effective manner possible, maintain uniformity throughout the nation, and not overburden the North American Numbering Plan Administrator ("NANPA") and the industry, BellSouth urges the Commission to take the actions summarized below.

*Definition of Assigned Numbers.* The Commission should adopt the United States Telecom Association's ("USTA") proposed definition of "assigned" numbers. As the record demonstrates, the current definition does not account for the realities of activating a telephone number, imposes technical and administrative burdens on carriers, and threatens to negatively impact customers. Accordingly, BellSouth urges the Commission to adopt the more practical definition of "assigned" numbers as proposed by USTA.

*National Pooling Framework.* BellSouth cautions the Commission against adopting requests by certain petitioners seeking to modify substantially the national pooling framework. Many of these requests have already been addressed by the Commission, are premature, or are simply too aggressive given that we are in the early stages of pooling implementation. Specifically, BellSouth urges the Commission to take the following actions:

- (1) reject requests to impose a utilization threshold requirement on pooling carriers;
- (2) reject requests to require wireless carriers to implement pooling by January 2001;
- (3) not increase the rollout schedule for pooling implementation beyond the current rate of three NPAs per NPAC region per quarter;
- (4) clarify that pooling costs not recovered through state cost recovery mechanisms must be eligible for recovery under a federal mechanism;
- (5) preclude state commissions from implementing 100-block number pooling or unassigned number porting; and
- (6) continue to require all carriers to comply with the T1S1.6 requirements as the national standard for pooling.

*Reporting Requirements.* BellSouth joins various commenters in urging the Commission to maintain uniform reporting obligations that do not pose unnecessary costs and burdens on the NANPA and the carriers. Accordingly, the Commission should:

- (1) prohibit state commissions from imposing additional reporting requirements;
- (2) reject proposals seeking to require the NANPA and the Pooling Administrator to contemporaneously notify state commissions of all code and block applications; and
- (3) require resellers and non-carriers to comply with the new reporting obligations by submitting their own utilization and forecast data directly to the NANPA.

*Sequential Numbering Rules.* The Commission should adopt Sprint's proposal to replace the existing sequential numbering rules with thousands-block management rules. The current rules for sequential number assignment are impractical in the real world. Thousands-block management procedures similar to those adopted in various states, however, provide a carrier with the flexibility necessary to serve its customers while at

the same time limiting unnecessary block contamination. Accordingly, the Commission should replace its current sequential numbering rules with reasonable thousands-block management procedures.

*Withholding Numbers For Incomplete Applications.* The current rules do not clearly indicate the scope of NANPA's ability to withhold numbers for insufficient applications. BellSouth therefore urges the Commission to clarify that the scope of the withholding is limited to the scope of the noncompliance.

*Review and Approval of Industry Numbering Guidelines.* The Commission should deny the request to establish a joint state and federal committee to review and approve industry numbering guidelines. Although state involvement in the process of establishing guidelines is valuable, review by a joint committee is unnecessary and would lead to additional delay in adopting such guidelines. States can – and have – participated in every aspect of the process of establishing the new rules for number optimization in the absence of such a committee. Therefore, the creation of a joint federal-state committee to approve industry numbering guidelines is unwarranted.

*State Commission Review of NANPA Decisions To Withhold Numbers.* BellSouth agrees with those parties urging the Commission to establish a deadline by which state commissions must either affirm or overturn the NANPA's decision to withhold numbering resources. The current rules do not impose a deadline by which states must make a decision. BellSouth therefore recommends that the Commission require states to act on carrier appeals of NANPA's decision to withhold numbering resources within 15 days.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
  
Numbering Resource Optimization

CC Docket No. 99-200

**BELLSOUTH OPPOSITION AND COMMENTS**

BellSouth Corporation, by counsel and on behalf of itself and its affiliated companies (“BellSouth”),<sup>1</sup> respectfully submits its opposition to and comments in support of certain petitions for reconsideration of the *Report and Order* adopted in the above-captioned proceeding.<sup>2</sup>

**I. THE COMMISSION SHOULD ADOPT USTA’S PROPOSED DEFINITION OF ASSIGNED NUMBERS.**

BellSouth supports the United States Telecom Association’s (“USTA”) recommended definition of “assigned” numbers. Specifically, USTA proposes the following definition:

Assigned numbers are numbers working in the Public Switched Telephone Network under an agreement such as a contract or tariff at the request of specific end users or customers for their use, or numbers not yet working **but to which an active service order applies.** Numbers that are not yet working and have a service order pending, **but not yet active,** for more than five days shall not be classified as assigned numbers.<sup>3</sup>

---

<sup>1</sup> BellSouth Corporation is a publicly traded Georgia corporation that holds the stock of companies that offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

<sup>2</sup> *Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 00-104 (rel. Mar. 31, 2000) (“*NRO Order*” and “*FNPRM*”).

<sup>3</sup> USTA Petition at 11.

A number of parties thoroughly detail the unique problems resulting from the combination of the Commission's five-day pending limit and the 45-day maximum reservation period.<sup>4</sup> Adoption of USTA's proposed definition for "assigned" numbers would help address the impracticalities and administrative burdens associated with the current rules.

As the record convincingly demonstrates, the five-day limit on pending orders is unworkable for a number of reasons. First, telephone number activations typically take longer than five days due to the various service provisioning steps.<sup>5</sup> Second, the process of changing pending numbers to reserved status and back to assigned is currently impossible to achieve due to network and system limitations. At this time, most, if not all, carrier networks, including BellSouth's, are incapable of converting numbers in pending status to reserved status. Third, switching numbers from assigned to reserved distorts the utilization of carriers since reserved numbers are excluded from the numerator of the utilization formula. In other words, despite the fact that at no time is the number available for reassignment to another customer, a carrier's utilization rate will decrease as numbers are converted to reserved status. This change in the carrier's utilization rate is misleading and could lead to the denial of numbering resources – a risk

---

<sup>4</sup> See, e.g., Association for Local Telecommunications Services ("ALTS") Petition at 13-14; USTA Petition at 2-9. BellSouth continues to object to the length of the reservation period and urges the Commission to reconsider the 45 day maximum. See BellSouth Petition at 5-11 (filed July 17, 2000). BellSouth supports the adoption of the reservation period proposed by the North American Numbering Council("NANC") Numbering Resource Optimization ("NRO") Working Group – a one-year limit with the possibility of a one-time six-month extension.

<sup>5</sup> See, e.g., ALTS Petition at 13-14; AT&T Petition at 9; Verizon Petition for Suspension of Enforcement Date and Reconsideration, CC Docket No. 99-200, at 4 (filed July 17, 2000); WorldCom Petition at 6.



that is especially crucial for non-pooling carriers, which must achieve a given utilization threshold prior to obtaining growth codes.

Finally, customers will suffer harm. As USTA points out, customers, especially business and other large volume users, will take actions based on their expectations that a specific number has been assigned or reserved for their use (*e.g.*, print stationery, request inclusion in telephone directories, advertise the number to the public, etc.).<sup>6</sup> If the period required to activate the number exceeds 50 days (5 days pending + 45 day reservation) for whatever reason, the customer is likely to lose that specific telephone number thereby resulting in lost dollars and customer confusion. To minimize the adverse effects described above, BellSouth urges the Commission to adopt USTA's proposed definition of "assigned" numbers.

## **II. THE COMMISSION SHOULD CLARIFY SEVERAL ASPECTS OF ITS NATIONAL POOLING FRAMEWORK.**

### **A. The Commission Should Reject Requests To Impose A Utilization Threshold Requirement On Pooling Carriers.**

Contrary to the suggestions of some state regulatory bodies,<sup>7</sup> the Commission should not require all carriers (pooling and non-pooling) to meet a utilization threshold in order to obtain growth codes. The Commission has already addressed this issue and properly concluded that pooling carriers should be exempt given their participation in the donation of thousands-blocks.<sup>8</sup> The Commission stated that it might "revisit the question

---

<sup>6</sup> USTA Petition at 7.

<sup>7</sup> *See, e.g.*, California Public Utilities Commission and the People of the State of California ("CPUC") Petition at 6; Maine Public Utilities Commission ("Maine PUC") Petition at 11.

<sup>8</sup> *NRO Order*, ¶ 103.

of whether all carriers should be subject to meeting a utilization threshold to obtain growth numbering resources if [it] find[s] that such thresholds significantly increase numbering use efficiency.”<sup>9</sup> Therefore, it is premature at this time to impose this requirement on all carriers. A more reasonable approach is to allow the various conservation measures adopted in the *NRO Order* time to work before imposing additional and unproven obligations on carriers. Therefore, BellSouth urges the Commission not to apply a utilization threshold requirement to pooling carriers and, as demonstrated in its Petition, to reconsider imposing a utilization threshold requirement on non-pooling carriers.<sup>10</sup>

**B. The Commission Should Reject Requests To Require Wireless Carriers To Implement Pooling By January 2001.**

The Commission should deny the Florida Public Service Commission’s (“FLPSC”) proposal to require CMRS carriers to participate in pooling effective January 1, 2001.<sup>11</sup> Again, the Commission has already addressed this issue and properly concluded that granting CMRS carriers additional time to implement number portability will serve the public interest.<sup>12</sup> Currently, CMRS carriers must implement number portability by November 24, 2002.

The FLPSC has failed to demonstrate compelling reasons why the Commission should withdraw its grant of forbearance. Perhaps more importantly, there is no way that

---

<sup>9</sup> *NRO Order*, ¶ 103.

<sup>10</sup> BellSouth Petition at 15-20.

<sup>11</sup> FLPSC Petition at 6 (filed May 9, 2000).

<sup>12</sup> See *Cellular Telecommunications Industry Association’s Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations*, WT Docket No. 98-229; *Telephone Number Portability*, CC Docket No. 95-116, *Memorandum Opinion and Order*, 14 FCC Rcd 3092 (1999).

wireless carriers could commence pooling by January 2001 (less than five months away), because the industry is still working on developing a technical solution to provide wireless number portability. The infrastructure required to implement number portability must be in place before wireless carriers can begin pooling. Thus, several critical steps in the development process must occur before CMRS carriers are even capable of participating in pooling.

More importantly, the Commission has expressly “decline[d] to order covered CMRS service providers to speed up their implementation of LNP solely for the purpose of implementing thousands-block number pooling.”<sup>13</sup> In declining to force CMRS carriers to implement LNP sooner, the Commission correctly recognized that “such a requirement would necessitate substantial effort and expense.”<sup>14</sup> Accordingly, the Commission should deny the FLPSC request to require CMRS carriers to commence pooling effective January 2001 and affirm that CMRS carriers are not required to comply with the number portability obligations until November 24, 2002.<sup>15</sup>

---

<sup>13</sup> *NRO Order*, ¶ 137.

<sup>14</sup> *Id.*

<sup>15</sup> BellSouth and a number of other commenters have also urged the Commission to grant CMRS carriers a transition period after the implementation of number portability to commence pooling. *See, e.g.*, AT&T Comments on *FNPRM* at 8-10 (filed May 19, 2000); Bell Atlantic Comments on *FNPRM* at 8-9 (filed May 19, 2000); BellSouth Comments on *FNPRM* at 9-12 (filed May 19, 2000); CTIA Comments on *FNPRM* at 13-16 (filed May 19, 2000); GTE Comments on *FNPRM* at 9-10 (filed May 19, 2000); Nextel Comments on *FNPRM* at 5-6 (filed May 19, 2000); SBC Comments on *FNPRM* at 12-13 (filed May 19, 2000); Sprint Comments on *FNPRM* at 10-15 (filed May 19, 2000); Time Warner Comments on *FNPRM* at 6-7 (filed May 19, 2000); US WEST Comments on *FNPRM* at 5 (filed May 19, 2000); Verizon Comments on *FNPRM* at 23-24 (filed May 19, 2000); VoiceStream Comments on *FNPRM* at 13-16 (filed May 19, 2000); WorldCom Comments on *FNPRM* at 13-15 (filed May 19, 2000).

**C. The Commission Should Not Establish A More Aggressive Rollout Schedule For Pooling Implementation.**

The Commission should reject the FLPSC's proposal to increase the schedule for nationwide pooling implementation to six NPAs per quarter per NPAC region.<sup>16</sup> As explained by NeuStar in an *ex parte*, the FLPSC's proposal reflects a misunderstanding of NeuStar's capabilities<sup>17</sup> and therefore should be denied. The FLPSC apparently misconstrued statements made by NeuStar regarding their ability to accommodate more than three NPAs per quarter per NPAC region as required under the current rule.<sup>18</sup> In responding to the instant request by the FLPSC, NeuStar explained that its offer to accommodate six NPAs in a quarter "was made in the context of a Florida-specific pooling rollout . . ."<sup>19</sup> and was "not intended to apply to national pooling efforts."<sup>20</sup> In light of this misunderstanding, there is no need to modify the rollout schedule for pooling. As NeuStar indicated, the Commission's deployment schedule "was based upon prudent management of NeuStar resources."<sup>21</sup> Since there is no evidence in the record to support a more aggressive schedule, the Commission should deny the FLPSC request.

BellSouth further urges the Commission to require strict compliance with the current schedule of no more than three NPAs per NPAC region per quarter. As BellSouth demonstrated in its Petition, the Commission must take an active leadership

---

<sup>16</sup> See FLPSC Petition at 6.

<sup>17</sup> *Ex Parte*, CC Docket No. 99-200, Letter to Ms. Magalie Roman Salas, Secretary, FCC from Cheryl A. Tritt, Counsel to NeuStar, Inc. (dated June 13, 2000) ("NeuStar *Ex Parte*").

<sup>18</sup> See *NRO Order*, ¶ 159.

<sup>19</sup> NeuStar *Ex Parte* at 2.

<sup>20</sup> *Id.* at 1.

<sup>21</sup> *Id.* at 2.

role to ensure that the current multiple state pooling trials do not exceed the maximum rollout schedule. This role has become even more critical in light of the recent grant of pooling authority to an additional 13 states thereby bringing the number of states with such authority to 24.<sup>22</sup>

Coordination of state pooling trials is absolutely essential. BellSouth's nine-state region offers an illustrative example of the potential problem of conflicting pooling efforts. Three states in BellSouth's region (Florida and most recently North Carolina and Tennessee) have received pooling authority. In the absence of coordination, there is a strong possibility that there could be multiple pooling trials in BellSouth's region that exceed the limit of three NPAs per NPAC region per quarter. To ensure that neither the North American Numbering Plan Administrator ("NANPA") nor carriers are overburdened by multiple state pooling efforts, the Commission should require strict compliance with the rollout schedule (no more than three NPAs per NPAC region per quarter). If the states are unable to coordinate among themselves when conflicts arise, the Commission must be willing to step in and assume the role of final arbiter to resolve any conflict.

**D. The Commission Should Clarify That Pooling Costs Not Recovered Through State Cost Recovery Mechanisms Must Be Eligible For Recovery Under A Federal Mechanism.**

BellSouth agrees with SBC that the Commission should "clarify that any unrecovered costs incurred as a result of state pooling trials are includable under the federal cost recovery mechanism."<sup>23</sup> Carriers are entitled to full cost recovery, and the

---

<sup>22</sup> See *Numbering Resource Optimization, et al.*, CC Docket Nos. 99-200, et al., *Order*, DA 00-1616 (rel. July 20, 2000) ("*Joint State Numbering Order*").

<sup>23</sup> SBC Petition at 6.

Commission has expressly “conclude[d] that the costs of numbering administration, specifically the costs of thousands-block number pooling, will be recovered through an exclusively federal recovery mechanism.”<sup>24</sup> The Commission also has indicated that it “will allow incumbent LECs to recover all their qualifying costs for thousands-block number pooling under the federal cost recovery mechanism . . . .”<sup>25</sup> Therefore, if a state mechanism does not provide full recovery of legitimate costs, the Commission must allow carriers to recover such costs through the federal mechanism.

**E. The Commission Should Not Allow States To Implement 100-Block Number Pooling Or Unassigned Number Porting.**

BellSouth urges the Commission to deny the requests to implement 100-block number pooling<sup>26</sup> and unassigned number porting.<sup>27</sup> The Commission has adopted thousands-block pooling as the “mandatory nationwide numbering resource optimization strategy.”<sup>28</sup> It is premature to grant states authority to implement a different framework or technology when the industry is only at the initial stages of implementing thousands-block pooling. The most effective and efficient approach therefore is to allow the Commission, the NANPA, the state regulators, and the industry to work through thousands-block pooling before imposing a different conservation scheme.

Moreover, the Commission clearly recognizes the value of establishing a single, nationwide pooling strategy at this time. It has repeatedly denied requests to implement other optimization measures such as unassigned number porting and individual telephone

---

<sup>24</sup> *NRO Order*, ¶ 196.

<sup>25</sup> *Id.*, ¶ 197.

<sup>26</sup> *See* FLPSC Petition at 10.

<sup>27</sup> *See* WorldCom Petition at 10.

<sup>28</sup> *NRO Order*, ¶ 122.

number pooling.<sup>29</sup> As the Commission has properly concluded, these measures have not yet been sufficiently developed for adoption on a nationwide scale, and the agency has encouraged parties to study the effects of these measures.<sup>30</sup> Such investigation is actively underway at various industry bodies and committees, including the Alliance for Telecommunications Industry Solutions (“ATIS”) and the North American Numbering Council (“NANC”). Therefore, the Commission should deny requests to grant states authority to conduct 100-block pooling and unassigned number porting at this time. The Commission can always re-evaluate its decision at a later date.<sup>31</sup>

**F. The Commission Should Continue To Require All Carriers To Comply With The T1S1.6 Technical Requirements For Pooling.**

Contrary to WorldCom’s suggestion, the Commission should not eliminate the T1S1.6 requirements as the technical standard for national thousands-block number pooling. WorldCom proposes that carriers be allowed to implement thousands-block pooling using whatever technical requirements they choose.<sup>32</sup> This approach plainly contradicts the Commission’s efforts to establish a uniform nationwide pooling framework. As the Commission acknowledges, the T1S1.6 requirements “are the result of an extensive industry effort and represent a broad-consensus of various industry segments.”<sup>33</sup> BellSouth believes that uniform technical requirements offer the best

---

<sup>29</sup> *NRO Order*, ¶ 230.

<sup>30</sup> *Id.*, ¶ 231; *Joint State Numbering Order*, ¶ 58 (denied requests to implement individual telephone number pooling).

<sup>31</sup> The Commission has asked parties to forward recommendations regarding unassigned number porting and individual telephone number pooling to it by January 1, 2001. *NRO Order*, ¶ 231.

<sup>32</sup> WorldCom Petition at 9.

<sup>33</sup> *NRO Order*, ¶ 181.

chance for an efficient, timely rollout of pooling. Allowing carriers to use different requirements will only complicate the rollout and could lead to delay. The Commission should therefore reject WorldCom's request to eliminate the requirement that carriers implement thousands-block pooling using the T1S1.6 technical requirements.

### **III. THE COMMISSION SHOULD NOT ALLOW INDIVIDUAL STATES TO IMPOSE ADDITIONAL AND ONEROUS REPORTING REQUIREMENTS ON CARRIERS.**

BellSouth joins various commenters in urging the Commission to prohibit state commissions from establishing their own reporting requirements.<sup>34</sup> The Commission has expressed a clear need for uniform reporting rules in order to ensure that neither the NANPA nor carriers are overburdened. Thus, the Commission should reject the request of the Ohio Public Utilities Commission ("OH PUC") for unlimited authority to require carriers to submit data beyond the semi-annual reports submitted to the NANPA.<sup>35</sup> The rationale behind the adoption of the new reporting requirements was to ensure that sufficient information was made available to both the NANPA and the states in a uniform manner. Allowing states to impose diverse reporting requirements will only undermine this goal.

The Commission should refuse to grant states more expansive authority in the area of carrier reporting for a number of reasons. First, state commissions already have clear authority to access carrier data on number usage. For example, state regulators can freely obtain carrier reports submitted to the NANPA<sup>36</sup> as well as access more detailed

---

<sup>34</sup> See, e.g., Sprint Petition at 19-21; Verizon Wireless Petition at 23-24; WorldCom Petition at 8.

<sup>35</sup> OH PUC Petition at 4-12.

<sup>36</sup> *NRO Order*, ¶ 76; 47 C.F.R. § 52.15(f)(7).



information under special circumstances.<sup>37</sup> Second, a state-by-state approach to reporting conflicts directly with the Commission's desire for "a uniform standard that all carriers could use in their record keeping and reporting activities."<sup>38</sup> Carriers are already having difficulty complying with the new national reporting requirements as evidenced by the numerous stay requests and waiver petitions recently filed.<sup>39</sup> Permitting individual states to establish diverse reporting rules will only make matters worse and impose unnecessary costs and burdens on carriers. Thus, the Commission should not permit state commissions to adopt their own reporting requirements. Adhering to a single set of reporting rules nationwide is a more efficient approach and permits states and the Commission to analyze usage based on a uniform set of data.

BellSouth also urges the Commission to reject proposals seeking to require the NANPA and the Pooling Administrator ("PA") to contemporaneously notify state commissions of all code and block applications.<sup>40</sup> This request is wholly impractical and would completely overwhelm the NANPA and the PA. In its recent request for

---

<sup>37</sup> *NRO Order*, ¶ 76. The Commission must ensure that state commissions do not abuse this privilege. Therefore, the Commission should reiterate that states requesting additional data from carriers must have a valid reason and are prohibited from establishing regularly scheduled reporting requirements.

<sup>38</sup> *NRO Order*, ¶ 76.

<sup>39</sup> See, e.g., Qwest Corporation Request for Expedited Deferral of Effective Date or, Alternatively, a Waiver or Stay of Portions of Soon-To-Be Effective Rule 47 C.F.R. Section 52.15(f), CC Docket No. 99-200 (filed July 10, 2000); Motion for Extension of Time, filed on behalf of the Association for Local Telecommunications Services, the Competitive Telecommunications Association, and the Personal Communications Industry Association, CC Docket No. 99-200 (filed July 14, 2000); Winstar Communications, Inc. Motion for Extension of Time, CC Docket No. 99-200 (filed July 17, 2000); Cincinnati Bell Telephone Company Petition for Waiver and Extension of Time, CC Docket No. 99-200 (filed July 20, 2000); VoiceStream Wireless Corporation Petition for Temporary Waiver of 47 C.F.R. §§52.15(f)(6)(i) and 52.15(j), CC Docket No. 99-200 (filed July 20, 2000); BellSouth Telecommunications, Inc. Emergency Petition for Partial Waiver and Extension of Time (filed July 24, 2000).

<sup>40</sup> CPUC Petition at 18; Maine PUC Petition at 12.

additional compensation to perform new functions resulting from the *NRO Order*, the NANPA indicated that it processed over 40,000 code requests from 11/98 to 11/99 and “is on pace to process approximately 48,000 to 50,000 code requests” from 11/99 to 11/00.<sup>41</sup> Requiring the NANPA to provide 50,000 applications to state commissions is impractical. Moreover, it is highly unlikely that state commissions would want to be swamped with all of this data. It is much more reasonable and administratively efficient for all parties involved to allow the NANPA to notify state regulators of carrier applications and code requests through its proposed monthly report.<sup>42</sup>

#### **IV. THE COMMISSION SHOULD NOT EXEMPT RESELLERS AND NON-CARRIERS FROM COMPLYING WITH THE NEW REPORTING REQUIREMENTS.**

BellSouth strongly opposes WorldCom’s proposal to exempt resellers that receive intermediate numbers from complying with the new reporting obligations.<sup>43</sup> The Commission’s rules appropriately require carriers that receive *intermediate numbers*, such as resellers, to report forecast and utilization data for such numbers to the NANPA to the same extent required for code and block holders.<sup>44</sup> If a carrier obtains numbers from another carrier, the NANPA, or the Pooling Administrator, it should be responsible for reporting its own usage. WorldCom has offered no reasonable justification for

---

<sup>41</sup> NeuStar, Inc. Petition for Compensation Adjustment, Request for Approval of Implementation Schedule and Emergency Request for Interim Relief, Attachment Section 5.1 Current NANPA Pricing (page 5-1); Section 5.2.1 Cost Category (Function) Descriptions (page 5-6) (filed June 30, 2000) (“NeuStar Petition for Compensation Adjustment”).

<sup>42</sup> See NeuStar Petition for Compensation Adjustment, Attachment, Section 2.5 State Commission Access to CO Code Application Data and Involvement in CO Code Processing (page 2-7).

<sup>43</sup> WorldCom Petition at 7.

<sup>44</sup> *NRO Order*, ¶ 40.

excusing resellers. Resellers use numbers just like facilities-based carriers and should be required to account for their number usage just like any other carrier.

For many of the reasons identified above, BellSouth also urges the Commission to reject the ALTS' recommendation to exclude numbers assigned to resellers from the intermediate category.<sup>45</sup> ALTS proposes that the Commission limit the definition of intermediate numbers to include only those numbers in dealer numbering pools and numbers preprogrammed into customer premises equipment.<sup>46</sup> BellSouth opposes this suggestion because it would have the practical effect of exempting resellers from complying with the reporting requirements. Some entity would have to report these intermediate numbers, and this responsibility would fall on the initial assigning carrier. In order to provide accurate reporting of those intermediate numbers ultimately assigned to end users, the reseller would have to provide this data to the initial carrier. BellSouth has already demonstrated above and in its Petition, that such reporting between entities is problematic. The only entity in possession of valid data regarding the use of numbers by resellers are the resellers to whom the numbers have been assigned. Therefore, the reseller is the only logical entity that can provide accurate data. Consequently, all carriers, including resellers, should do their own reporting. Accordingly, BellSouth urges the Commission to deny the ALTS request because it would shift the reporting burden entirely to the initial assigning carrier and would relieve resellers of any reporting obligations – contrary to the current rules.

---

<sup>45</sup> See ALTS Petition at 11.

<sup>46</sup> ALTS Petition at 11.

The Commission should not only retain its rule requiring resellers to provide utilization and forecast reports to the NANPA, but also require “non-carrier” entities to submit reports directly to the NANPA. The current rules require carriers providing intermediate numbers to non-carrier entities to report to the NANPA on behalf of these non-carriers.<sup>47</sup> As BellSouth proposed in its Petition, the Commission should impose the same reporting obligations on non-carriers.<sup>48</sup>

Petitioners, including BellSouth and PCIA, describe the practical difficulties associated with requiring carriers to report number usage for non-carriers. First, carriers have no way to obtain such data from non-carriers.<sup>49</sup> Second, as both AT&T and PCIA point out, requiring carriers to report for other entities exposes these carriers to potential liability.<sup>50</sup> Third, this arrangement creates a situation in which a carrier’s ability to obtain numbering resources may depend upon receiving accurate and timely data from another entity. BellSouth does not believe that a carrier’s access to numbers should be contingent on another entity’s willingness to provide data in a timely manner. Customer demand for telecommunications services drives a carrier’s need for numbers and should continue to do so.

The Commission can avoid the difficulties described above by requiring both carriers and non-carriers to report their own utilization and forecast data directly to the NANPA. This approach will provide a more accurate and timely view of actual number

---

<sup>47</sup> *NRO Order*, ¶ 40.

<sup>48</sup> BellSouth Petition at 2-3.

<sup>49</sup> *See, e.g.*, BellSouth Petition at 3; PCIA Petition at 11-12.

<sup>50</sup> AT&T Petition at 4-5 n.4; PCIA Petition at 12.

usage as well as identify and hold accountable the entity both responsible for using the numbers and privy to its own usage information.

**V. THE COMMISSION SHOULD MODIFY ITS SEQUENTIAL NUMBERING RULES TO MAKE THEM MORE PRACTICAL AND TO ENSURE FLEXIBILITY.**

BellSouth objects to requests by the CPUC and the Ohio PUC to promulgate more stringent sequential numbering requirements.<sup>51</sup> The existing rule, if applied literally, is impractical and would inhibit customer choice. BellSouth therefore supports Sprint's recommendation that the Commission replace the sequential numbering rules with thousands-block management rules as adopted by a number of states.<sup>52</sup>

BellSouth believes that the Commission can attain its goal – “to forestall [ ] thousands blocks from becoming contaminated – and thus ineligible for possible donation to a pool”<sup>53</sup> – through less burdensome means. Specifically, thousands-block management procedures similar to those adopted in Florida are a more practical way to achieve the desired outcome. BellSouth is one of a number of carriers adhering to the thousands-block management procedures adopted by the FLPSC and supports the implementation of similar procedures on a national level. The Florida procedures are fully consistent with the *NRO Order* as well as the Commission's express desire to provide carriers with the flexibility necessary to serve customers.

BellSouth further agrees with PCIA that the Commission should limit states' ability to enforce the sequential numbering rules. As PCIA correctly concludes, “[s]tate enforcement of the sequential numbering rules would likely cause carriers to face a

---

<sup>51</sup> See CPUC Petition at 15; OH PUC Petition at 18-19.

<sup>52</sup> See Sprint Petition at 3-5.

<sup>53</sup> *NRO Order*, ¶ 245.

hodgepodge of inconsistent rules and practices.”<sup>54</sup> State regulators must be consistent when interpreting and enforcing the Commission’s rules; therefore, the Commission should not allow 51 different applications of these rules. Limiting states’ enforcement authority is the best way to ensure that carriers operating in multiple states can comply with the sequential number assignment provisions.

**VI. THE COMMISSION SHOULD CLARIFY THE SCOPE OF WITHHOLDING NUMBERS FOR INADEQUATE APPLICATIONS FOR NUMBERING RESOURCES.**

BellSouth supports Verizon Wireless’ recommendation that the Commission clarify the scope of NANPA’s ability to withhold numbers for insufficient applications to obtain numbers.<sup>55</sup> BellSouth believes, as Verizon Wireless does, that the “*maximum* scope of the withholding should be limited by the scope of the noncompliance.”<sup>56</sup> For example, a carrier that supplies inadequate data for a single rate center should not be penalized by the NANPA withholding numbers for the entire state. There must be some rational limit to the reach of the withholding. BellSouth therefore urges the Commission to clarify that the scope for withholding numbers is limited to the scope of the carrier’s noncompliance.

**VII. THE COMMISSION SHOULD NOT ESTABLISH A JOINT FEDERAL-STATE COMMITTEE TO APPROVE NUMBERING GUIDELINES.**

The Commission should deny the request of the Maine PUC to establish a joint state and federal committee to review and approve industry numbering guidelines.<sup>57</sup>

---

<sup>54</sup> PCIA Petition at 16.

<sup>55</sup> See Verizon Wireless Petition at 24-25.

<sup>56</sup> Verizon Wireless Petition at 24 (emphasis included).

<sup>57</sup> See Maine PUC Petition at 9-10.

BellSouth agrees that state involvement in the process of establishing numbering guidelines is valuable; however, review by a joint federal-state committee is unnecessary and would lead to additional delay in adopting policies and guidelines.

The Maine PUC asserts that a joint committee is needed because state commissions do not have the financial or staffing resources to participate in Industry Numbering Committee (“INC”) meetings and that such meetings are dominated by the industry.<sup>58</sup> While BellSouth is sensitive to these concerns, it believes that state commissions are afforded ample opportunity to participate in meetings held by the INC. If resources are an issue, a state can rely on NARUC to represent its interests. The Maine PUC is a member of NARUC, and NARUC is an active participant in various Commission proceedings. The Maine PUC acknowledges that NARUC has served an important role by “ensur[ing] that all states are aware of what each state is doing on numbering issues and [ ] [by] encourag[ing] coordination and similarity in approach.”<sup>59</sup> A national infrastructure therefore is already in place that state commissions can take advantage of to represent their unique interests.

Moreover, to date, state commissions have been highly involved in all aspects of numbering at both the state and the federal level. They have participated in rulemakings at the Commission, held *ex partes* with the Commission, provided comments on the existing INC Guidelines, and actively participated in the NANC through their NARUC representation. The states are by no means being excluded from the process. In fact, they are in a position to review any and all guidelines as well as to hear and provide

---

<sup>58</sup> Maine PUC Petition at 9.

<sup>59</sup> Maine PUC Petition at 6.

guidance to working groups and forum bodies on a regular basis. Therefore, the creation of a joint federal-state committee to approve industry numbering guidelines is unwarranted.

**VIII. THE COMMISSION SHOULD REQUIRE STATE COMMISSIONS TO ACT ON A CARRIER'S APPEAL OF THE NANPA'S DECISION TO WITHHOLD NUMBERING RESOURCES WITHIN A SPECIFIED TIME PERIOD.**

BellSouth agrees with parties such as Sprint that urge the Commission to establish a deadline by which state commissions must either affirm or overturn the NANPA's decision to withhold numbering resources.<sup>60</sup> Although the Commission requires the NANPA to notify a carrier of its decision to withhold numbering resources within ten days of receiving a request, no such limit is imposed on state commissions.<sup>61</sup> BellSouth therefore recommends that the Commission require states to decide carrier appeals within 15 days of the decision by the NANPA.

The Commission should not allow the time for decisionmaking to be open-ended. The Commission appropriately concluded that imposing a deadline on the NANPA was appropriate in order to protect carriers from protracted decisionmaking – which could interfere with timely access to numbering resources. The same rationale applies to decisionmaking by state commissions. State regulators should be held to a similar standard in order to ensure that carriers are not denied numbering resources due to delayed decisionmaking. Accordingly, BellSouth recommends that the Commission

---

<sup>60</sup> See Sprint Petition at 11. Sprint asks the Commission to establish deadlines by which state commissions must act on “imminent exhaust” petitions. BellSouth’s proposal extends beyond “imminent exhaust petitions.”

<sup>61</sup> See *NRO Order*, ¶ 98; see 47 C.F.R. § 52.15(g)(3)(iv).



require states to act on carrier appeals of the NANPA's decision to withhold numbering resources within 15 days of the NANPA denial.

## **IX. CONCLUSION**

For all of the foregoing reasons, BellSouth urges the Commission to take the actions requested herein.

Respectfully submitted,

**BELLSOUTH CORPORATION**

By Its Attorneys

/s/ Angela N. Brown

M. Robert Sutherland

Angela N. Brown

BellSouth Corporation

Suite 1700

1155 Peachtree Street, N.E.

Atlanta, GA 30309-3610

(404) 249-4839

(404) 249-3392

Date: August 15, 2000

## **CERTIFICATE OF SERVICE**

I do hereby certify that I have this 15<sup>th</sup> day of August, 2000, served the following parties to this action with a copy of the foregoing ***BELLSOUTH OPPOSITION AND COMMENTS***, reference CC Docket No. 99-200, by hand delivery, Federal Express, or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.

/s/ Rachelle L. Thomas

Rachelle L. Thomas

***\*Via Hand Delivery***

***\*\*Via Federal Express***

Service List  
CC Docket No. 99-200

Magalie Roman Salas, Commission Secretary\*  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

International Transcription Service, Inc.\*  
1231 20th Street, NW  
Washington, DC 20054

John McHugh  
Technical Director  
21 Dupont Circle, NW  
Suite 700  
Washington, DC 20036

Michael F. Altschul  
Randall S. Coleman  
Lolita D. Smith  
Cellular Telecommunications Industry  
Association  
Suite 800  
1250 Connecticut Avenue, NW  
Washington, DC 20036

James R. Hobson  
Counsel for The National Emergency Number  
Association ("NENA") and National  
Association of State Nine One One  
Administrators ("NASNA")  
Miller & Van Eaton, PLLC  
1155 Connecticut Avenue, NW, Ste. 1000  
Washington, DC 20036-4306

Sylvia Lesse  
John Kuykendall  
Counsel for Rural Cellular Association  
2120 L Street, NW, Suite 520  
Washington, DC 20037

Jeri A. Semer, CAE  
Executive Director  
ACUTA  
152 W. Zandale Dr., Suite 200  
Lexington, KY 40503

Jeffery S. Linder  
Daniel J. Smith  
Counsel for ACUTA-The Association for  
Telecommunications Professionals in Higher  
Education  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006-2304

Peter Arth, Jr.  
Lionel B. Wilson  
Helen M. Mickiewicz  
Attorneys for the Public Utilities Commission  
State of California  
505 Van Ness Ave  
San Francisco, CA 94102

E. Barclay Jackson  
New Hampshire Public Utilities Commission  
8 Old Suncook Road  
Concord, NH 03301

Maryland Office of People's Counsel  
6 St. Paul St.  
Suite 2102  
Baltimore, MD 21202-6806

Gary Crabtree  
Belton School District #124  
Director Finance/Support Services  
110 W. Walnut  
Belton, MO 64012

Carol Ann Bischoff  
Terry Monroe  
Competitive Telecommunications Assoc.  
1900 M Street NW  
Ste. 800  
Washington, DC 20036

Kathryn Marie Krause  
QWEST Corporation  
1020 19th St., NW, Ste. 700  
Washington, DC 20036

Michael A. Sullivan  
15 Spencer Avenue  
Somerville, MA 02144

Norman D. Cunningham  
Assistant Superintendent, Support Services  
Cypress-Fairbanks Independent School District  
12510 Windfern Road  
Houston, TX 77064-3108

Maine Public Advocate  
State House Station 112  
Augusta, ME 04333

Howard J. Symons  
Sara F. Seidman  
Amy L. Bushyeager  
Counsel for AT&T Corp.  
Mintz, Levin, Cohn, Ferris  
Glovsky and Popeo, PC  
701 Pennsylvania Ave, NW, Ste. 900  
Washington, DC 20004

Jay C. Keithley  
Attorney for Sprint Corporation  
401 9th Street, NW  
Ste. 400  
Washington, DC 20004

Sandra K. Williams  
Attorney for Sprint Corporation  
6360 Spring Parkway  
Mailstop: KSOPHE0302-3D203  
Overland Park, KS 66251

Jack A. Holzer  
Communications Services Manager  
Johnson County Sheriff's Office  
125 North Cherry Street  
Olathe, KS 66061

Lisa L. Karstetter  
Programmer/Telecomm Analyst  
City of Olathe, Kansas  
P.O. Box 178  
100 West Santa Fe Drive  
Olathe, KS 66061

Emprise Bank  
900 W Central Ave  
Wichita KS 67203-4987

R. Gregg Reep, Mayor  
The City of Warren  
P.O Box 352  
Warren, Arkansas 71671

Florida Office of Public Counsel  
c/o Florida Legislature  
111 West Madison Street, #812  
Tallahassee, FL 32399-1400

Indiana Office of Utility Consumer Counsel  
100 N. Senate Avenue, Room N501  
Indianapolis, IN 46204-2215

J. G. Harrington  
Laura Roecklein  
Counsel for Cox Communications Inc.  
Dow, Lohnes & Albertson PLLC  
1200 New Hampshire Ave, NW  
Ste. 800  
Washington, DC 20036

George N. Barclay  
Michael J. Ettner  
General Services Administration  
1800 F Street, NW, Room 4002  
Washington, DC 20405

Susan M. Eid  
Richard A. Karre  
MediaOneGroup, Inc.  
1919 Pennsylvania Ave, NW, Ste. 610  
Washington, DC 20006

John M. Goodman  
Attorney for Verizon  
1300 I Street, NW  
Ste. 400 West  
Washington, DC 20005

Jean Dols  
Interim C.I.O.  
Harris County Hospital District  
P.O. Box 66769  
Houston, Texas 77266

Lawrence G. Malone  
Public Service Commission  
of the State of New York  
Three Empire State Plaza  
Albany, NY 12223-1350

John W. Hunter  
Lawrence E. Sarjeant  
Linda L. Kent  
Julie E. Rones  
Keith Townsend  
United States Telecom Association  
1401 H Street, NW, Suite 600  
Washington, DC 20005

M. Susan Savage, Mayor  
Office of the Mayor  
City of Tulsa  
200 Civic Center  
Tulsa, Oklahoma 74103

Jennifer Fagan  
Office of Regulatory Affairs  
Public Utility Commission of Texas  
1701 N. Congress Ave.  
Austin, TX 78711

David Cosson  
John Kuykendall  
Counsel for Rural Independent Competitive Alliance  
Kraskin, Lesse & Cosson, LLP  
2120 L Street, NW, Ste. 520  
Washington, DC 20037

Texas Office of Public Utility Counsel  
1701 North Congress Ave., Ste. 9-180  
P.O. Box 78701  
Austin, TX 78701

Louise M. Tucker  
Telcordia Technologies, Inc.  
2020 K Street, NW  
Suite 400  
Washington, DC 20006

Joseph Assenzo  
Sprint PCS  
4900 Main Street, 11th Floor  
Kansas City, Missouri 64112

Michael S. Slomin  
Telcordia Technologies, Inc.  
445 South Street, MCC-1J130R  
Morristown, NJ 07960

Judith St. Ledger-Roty  
Todd D. Daubert  
Jennifer Kashatus  
Counsel for Personal Communications Industry Assoc.  
Kelley Drye & Warren LLP  
1200 19th St., Ste. 500  
Washington, DC 20036

Leon Kestenbaum  
Counsel for Sprint  
401 9th Street, NW, Suite 400  
Washington, DC 20004

Sue Frank, Mayor  
Raytown  
10000 East 59th Street  
Raytown, Missouri 64133

Henry G. Hultquist  
Mary De Luca  
Chuck Goldfarb  
Mark T. Bryant  
MCI WorldCom, Inc.  
1801 Pennsylvania Ave, NW  
Washington, DC 20006

John S. DiBene  
Roger K. Toppins  
Alfred G. Richter, Jr.  
Attorneys for SBC Communications Inc.  
1401 I Street, NW, Ste. 1100  
Washington, DC 20005

James S. Blaszak  
Counsel for Ad Hoc Telecommunications  
Users Committee  
Levine, Blaszak, Block & Boothsby LLP  
2001 L Street, NW  
Ste. 900  
Washington, DC 20036

Mark C. Rosenblum  
Roy E. Hoffinger  
James H. Bolin, Jr.  
AT&T Corporation  
295 North Maple Ave  
Room 1130M1  
Basking Ridge, NJ 07920

Jonathan M. Chambers  
Vice President-Federal Regulatory Affairs  
Sprint PCS  
401 9th Street, NW, Suite 400  
Washington, DC 20004



Marlene L. Johnson  
Chairperson  
District of Columbia  
Public Service Commission  
717 14th St., NW  
Washington, DC 20005

Peggy Arvanitas  
P.O. Box 8787  
Seminole, FL 33705

James Bradford Ramsay  
National Association of Regulatory  
Utility Commissioners  
1101 Vermont Avenue, NW  
Suite 200  
Washington, DC 20005

Teya M. Penniman  
Attorneys for Oregon Public Utility Commission  
Room 330  
550 Capitol Street, NE  
Salem, OR 97310-1380

Michael B. Adams, Jr.  
Benjamin H. Dickens, Jr.  
Attorneys for Midvale Telephone Exchange, Inc.  
Northeast Louisiana Telephone Company, Inc.,  
Interstate Telecommunications, Inc. Interstate  
Telecommunications Cooperative, Inc. and Radio  
Paging Service  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, NW  
Washington, DC 20037

Jonathan M. Askin  
Teresa K. Gaugler  
Association for Local Telecommunication Services  
888 17th St., NW, Ste. 900  
Washington, DC 20006

Richard Askoff  
Joe A. Douglas  
National Exchange Carrier Association, Inc.  
80 South Jefferson Road  
Whippany, NJ 07981

Missouri Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Pennsylvania Office of Consumer Advocate  
555 Walnut street  
54th Floor, Forum Place  
Harrisburg, PA 17101

Robert L. Hoggarth  
Harold Salters  
Personal Communications Industry Association  
500 Montgomery St., Ste. 700  
Alexandria, VA 22314-1561

Jonathan E. Canis  
Todd D. Daubert  
Counsel for 2nd Century Communications, LLP  
Kelley, Drye & Warren LLP  
1200 19th St., Ste. 50  
Washington, DC 20036

Cynthia B. Miller  
Bureau of Intergovernmental Liaison  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399

Robert J. Aamoth  
Todd D. Daubert  
Attorneys for Competitive Telecommunications  
Association  
Kelley, Drye & Warren LLP  
1200 19th St., Ste. 500  
Washington, DC 20036

Joel H. Cheskis  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101

John T. Scott, III  
Vice President and Deputy General Counsel-  
Regulatory Law  
Verizon Wireless  
1001 Pennsylvania Ave, NW  
Washington, DC 20004

Marsha N. Cohan  
Professor of Law  
Hastings College of the Law  
University of California  
200 McAllister Street  
San Francisco, CA 94102

Robert Foosaner  
Lawrence R. Krevor  
Laura L. Holloway  
James B. Goldstein  
Nextel Communications, Inc.  
2001 Edmund Halley Drive  
Reston, VA 20191

L. Marie Guillory  
Daniel Mitchell  
National Telephone Cooperative Assoc.  
4121 Wilson Blvd., 10th Floor  
Arlington, VA 22203

Marc D. Poston  
Missouri Public Service Commission  
Room 750, 301 West High Street  
Jefferson City, MO 65101

Elizabeth H. Liebschutz  
State of New York Dept. of Public Service  
Three Empire State Plaza  
Albany, NY 12223

The Office of People's Counsel  
District of Columbia  
1133-15th Street, NW  
Suite 500  
Washington, DC 20005

Brian Thomas O'Connor  
Robert A. Calaff  
Voicestream Wireless Corporation  
1300 Pennsylvania Ave, NW, Ste. 700  
Washington, DC 20004

The Utility Reform Network  
711 Van Ness Avenue, Suite 350  
San Francisco, CA 94102

James U. Troup  
Robert H. Jackson  
Attorneys for Iowa Telecommunications Services, Inc.  
Arter & Hadden LLP  
1801 K Street, NW, Ste. 400K  
Washington, DC 20006-1301

Trina Bragdon, Esq.  
Maine Public Utilities Commission  
242 State Street  
State House Station 18  
Augusta, ME 04333

Deanne M. Brutts  
Frank B. Wilmarth  
Bohdan R. Pankiw  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

James D. Mullins  
Emergency Medical Services Authority  
1417 North Lansing Avenue  
Tulsa, OK 74106

Russell C. Merbeth  
Daniel F. Gonos  
Winstar Communications Inc.  
1146 19th St., NW  
Washington, DC 20036

Richard W. Rindler  
Jeanne W. Stockman  
Counsel for Allegiance Telecom, Inc.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007

Douglas I. Brandon  
AT&T Wireless Services, Inc.  
1150 Connecticut Services, Inc.  
Suite 400  
Washington, DC 20036

Lawrence Ausubel, Co-President  
Peter Cramton, Chairman  
Paul Milgrom, Co-President  
Counsel for Maine Public Utilities Commission  
Spectrum Exchange Group, LLC  
2920 Garfield Terrace, NW  
Washington, DC 20008

Richard W. Rindler  
Ronald W. Del Sesto, Jr., Esq.  
Counsel for RCN Telecom Services, Inc.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007

Cheryl A. Tritt  
Frank W. Krogh  
Counsel for NeuStar, Inc.  
Morrison & Foerster LLP  
2000 Pennsylvania Avenue, NW  
Suite 5500  
Washington, DC 20006-1888

Charles Ghini  
Deputy Chief Information Officer  
State Technology Office  
Florida Department Management Services  
4030 Esplanade Way, Suite 180  
Tallahassee, FL 32399-0950

California Office of Ratepayer Advocates  
505 Van Ness Ave., Room 4202  
San Francisco, CA 94102

Brian Conboy  
Thomas Jones  
Counsel for Time Warner Telecom  
Willkie Farr & Gallagher  
Three Lafayette Center  
1155 21st St., NW  
Washington, DC 20036

Daniel Gonzalez  
R. Gerard Salemmme  
Esther Northrup  
Nextlink Communications Inc.  
1730 Rhode Island Ave, NW  
Ste. 1000  
Washington, DC 20036

Daniel M. Waggoner  
Robert S. Tanner  
Dale Dixon  
Davis Wright Tremaine LLP  
1500 K Street  
Washington, DC 20005

Benjamin H. Dickens, Jr.  
Gerard J. Duffy  
Michael B. Adams, Jr.  
Counsel for Autopage, Inc. and Radio Paging Service;  
Counsel for Blackfoot Telephone Cooperative,  
Inc., et al.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, NW  
Washington, DC 20037

Michael D. McVicker, Assistant Director  
Telecommunication Services Division  
State of Washington  
Department of Information Services  
Olympia, Washington 98504-2445

Jodi J. Bair  
Assistant Attorney General  
Counsel for Public Utilities Commission of Ohio  
Public Utilities Section  
180 E. Broad Street, 7th Floor  
Columbus, OH 43215